

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

UNITED STATES OF AMERICA,

Plaintiff,

v.

Case No. 20-cr-232 (JRT/DTS)

UNITED STATES' BILL
OF PARTICULARS FOR
FORFEITURE OF PROPERTY

5. DAVID JOHN MOULDER,
6. ANTHONY EUGENE MOULDER,
8. BARBARA ANN MOULDER,
10. JEFFREY LEE SMOLIAK,

Defendants.

The United States Attorney's Office for the District of Minnesota, by and through Andrew M. Luger, United States Attorney, and Craig R. Baune, Assistant United States Attorney, hereby files the following Bill of Particulars.

Through the violations of 18 U.S.C. §§ 1341, 1343, and 1349 and 2326 as alleged in Counts 1, 4, 8, 12-14, 16, 18-19, 22, 25, 29-31, 33-34, 35, 37-40, 46, 48-49, and 53 of the Indictment, the United States seeks forfeiture, pursuant to 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c), of the following property:

- a. \$100,452.50 seized from Regions Bank, account No. 0263748037, in the name of ARCO Media Inc.;
- b. \$105,943.21 seized from Regions Bank, account No. 0263748266, in the name of ARCO Media Inc.;
- c. \$144,935.88 seized from American Century Investments, Acct. No. 020-600005427, in the name of Anthony E Moulder;
- d. \$144,310.12 seized from American Century Investments, Acct. No. 921-600019647, in the name of Anthony E Moulder;

- e. \$29,220.74 seized from American Century Investments, Acct. No. 101-600001954, in the name of Anthony E Moulder;
- f. \$92,114.83 seized from American Century Investments, Acct. No. 136-600002096, in the name of Anthony E Moulder;
- g. \$31,584.08 seized from Busey Bank account No. 500576566, with account holder Leisure Time Resources Inc.;
- h. \$2,205.88 seized from Total System Services Affiliates and Subsidiaries ("TSYS") Merchant Account, Merchant Identification No. 84870051601186, with account holder Leisure Time Resources Inc.;
- i. \$26,067.80 seized from All funds in Total System Services Affiliates and Subsidiaries ("TSYS") Merchant Account, Merchant Identification No. 84870008412823, with account holder Gulf Coast Readers Inc.;
- j. The real property located at 910 W. Cape Estates Cir., Cape Coral, Florida;
- k. \$65,258.02 in surplus proceeds retained by the Clerk of Court for Lee County, Florida, the Twentieth Judicial Circuit after the foreclosure sale of real property located at 916 W. Cape Estates Cir., Cape Coral, Florida;
- l. The real property located at 1022 SE 46th Street, 1B, Cape Coral, Florida; and
- m. The real property located at 17962 Judicial Road, Lakeville, Minnesota.

If the above-described forfeitable property is unavailable for forfeiture within the definition of 21 U.S.C. § 853(p), the United States intends to seek the forfeiture of substitute property pursuant to as 21 U.S.C. § 853(p) as incorporated by 28 U.S.C. § 2461(c).

Dated: 12-15-2022

Respectfully submitted

ANDREW M. LUGER
United States Attorney

s/Craig Baune

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